

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

**REQUEST OF THE UNITED STATES POSTAL SERVICE
FOR AN ADVISORY OPINION ON CHANGES IN
POSTAL SERVICES**

Docket No. N2006-1

**THIRD SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS DAVID E. WILLIAMS**

(POSTCOM/USPS-T2-14 - 20)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce directs the attached Third Set of Interrogatories to Witness Williams. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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POSTCOM/USPS-T2-14. In response to PostCom/USPS-T2-4 (b) you indicate several forms of communication that are used by the Postal Service to inform mailers of anticipated and effective changes in bulk mail entry locations, mail preparation or entry requirements, and any other changes in mail processing operations that affect mailers. You also indicate that there are hard copy and electronic forms "other" than those you list in that response. Please identify the complete set of Postal Service communication tools that would routinely need to be used or updated as a result of an ongoing and completed AMP consolidation.

POSTCOM/USPS-T2-15. In your response to PostCom/USPS-T2-4(a) you state, " the Postal Service has not determined it needs to develop standardized plans to communicate all of the events that could be depicted in documents such as the attachment to the response to PostCom/USPS-T2-1(b&c)."

- a. What task names on the sample Master Gantt Chart implementation plan that you refer to describe the task of utilizing the forms of communication that you identify in response to PostCom/USPS-T2-4(b)?
- b. Does your response to PostCom/USPS-T2-4(b) suggest that the communication steps that need to be taken with mailers in order for mail to be prepared and entered correctly during and following the implementation of an AMP consolidation could and/or should be incorporated in a Gantt chart that is used to manage the implementation of an AMP consolidation? Please explain your response.

POSTCOM/USPS-T2-16. Please identify the Postal Service departments and individuals responsible for or having ownership of each of the forms of communication and sources of data you list in response to PostCom/USPS-T2-4 and PostCom/USPS-T2-11.

POSTCOM/USPS-T2-17. In PostCom/USPS-T2-12, PostCom requested copies of the Postal Service's plans and procedures for ensuring that each of the sources of information that could need to be updated as a result of an AMP implementation or consolidations are actually updated on a timely basis. In response, you state simply, "Copies are not available at this time."

- a. Do such plans or procedures exist?
- b. If they do not exist, is the Postal Service in the process of developing such documents?
- c. If the documents do exist, given that no objection has been filed, when will they be provided?
- d. If the documents do exist and will not be provided in advance of the close of the record in this proceeding, please explain why not.

POSTCOM/USPS-T2-18. Has the Postal Service considered how the savings that may result from the AMP consolidations that are expected to be or have been implemented between FY2005 and FY2008 are likely to affect worksharing discounts? If so, what are the likely effects?

POSTCOM/USPS-T2-19. Current Postal Service drop entry rates for Standard Mail contemplate the existing network of dBMCs and dSCFs.

- a. How will the existing BMC and SCF destination entry rate scheme apply to the new facility types (RDCs, DPCs, etc.) as the network evolves? (For example, will the current dBMC rate apply to drop entry at destinating RDCs?)
- b. What changes to the destination entry rate scheme and rates are likely to occur as the network evolves?

POSTCOM/USPS-T2-20. In your response to PostCom/USPS-T2-13, you stated, "[t]he Postal Service works with mailers on a local basis to keep them informed of AMP consolidations as it deems necessary. The degree of advance notice can be expected to vary depending on the complexity of the particular consolidation and other local circumstances." With reference to this response,

- a. What criteria and tools does the Postal Service use to determine which mailers to notify?
- b. What is the Postal Service's definition of "local" in the context of an AMP consolidation?
- c. What is the nature of the information conveyed to mailers?
- d. What are the criteria used by the Postal Service in determining what information is "necessary" to convey, and which mailers it is "necessary" to notify?
- e. How does the Postal Service assess the degree of advanced notice a particular consolidation requires?
- f. What local circumstances might affect the need of mailers for advanced notice?

- g. How does the Postal Service determine the informational and advance-notice needs of mailers who are not “local”?
- h. What management function(s), position(s), or department(s) at the Postal Service is(are) responsible for communicating with mailers who are “local” in relation to AMP Consolidation?
- i. What management function(s), position(s), or department(s) at the Postal Service is(are) responsible for communicating with mailers who are not “local” in relation to AMP Consolidation?